

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PROTECT DEMOCRACY PROJECT, INC.,
BRENNAN CENTER FOR JUSTICE AT
NEW YORK UNIVERSITY SCHOOL OF
LAW, MICHAEL F. CROWLEY, AND
BENJAMIN WITTES,

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE, U.S.
DEPARTMENT OF HOMELAND
SECURITY, WILLIAM PELHAM BARR in
His Official Capacity as Attorney General of
the United States, and CHAD WOLF in His
Official Capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

Case No. 1:18-cv-10874-DPW

**DECLARATION OF SHANE A. HUNT IN OPPOSITION TO DEFENDANTS' MOTION
TO EXTEND TIME IN WHICH TO FILE SUPPLEMENTAL BRIEF**

SHANE A. HUNT declares under 28 U.S.C. § 1746 and penalty of perjury as follows:

1. I am an attorney admitted to practice *pro hac vice* before this Court. I am an associate at the law firm of O'Melveny & Myers LLP, counsel for Plaintiffs Protect Democracy, Inc., Brennan Center for Justice at New York University School of Law, Michael F. Crowley, and Benjamin Wittes.

2. I submit this declaration on behalf of Plaintiffs in opposition to the government's Motion to Extend Time in Which To File Supplemental Brief.

3. Counsel for the government emailed me at 5:37 p.m. EST today advising Plaintiffs that it intended to seek a two-day extension of the deadline for the supplemental briefing and seeking Plaintiffs' assent to the same.

4. At approximately 5:43 p.m. today, I attempted to reach counsel for the government by telephone to clarify whether the government's motion proposed to extend the time for both parties' filings, but was directed to voicemail.

5. At approximately 5:47 p.m. today, I received electronic notification from the Court's CM/ECF system that the government had unilaterally filed its Motion To Extend Time In Which to File Supplemental Brief.

Dated: December 11, 2019
New York, New York

By: /s/ Shane A. Hunt
Shane A. Hunt